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Reply to: Morristown

January 4, 2011

## VIA ELECTRONIC FILING

Honorable Dickinson R. Debevoise
U.S. District Court, District of New Jersey
Martin Luther King Jr. Federal Bldg.
& United States Courthouse
50 Walnut Street, Room 5083
Newark, New Jersey 07102

Re: <u>Dare Investments, LLC v. Chicago Title Ins. Co.</u>, Case No. 10-6088

## Dear Judge Debevoise:

We represent Chicago Title Insurance Company ("Chicago Title") in the abovenamed matter and filed the pending Motion for Revocation of Pro Hac Vice Admissions and Disqualification of Counsel, which Your Honor made returnable January 17, 2012. We write in response to the January 3, 2012 submission on behalf of Dare Investments, LLC ("Dare"), seeking to adjourn the return date of Chicago Title's motion for more than a month to February 21, 2012 (skipping the intervening February 6th motion day). Chicago Title was never asked to and certainly would not agree to adjourn the return date of its motion, and Dare's request to do so is a transparent attempt to have it returnable well after the current discovery cut-off of February 9, 2012. Given the serious and substantial grounds on which this motion is based, Chicago Title believes that its pending motion should be decided as soon as possible. Indeed, it will be imperative in this litigation that only counsel permitted to continue litigating this action be the same counsel participating in the depositions in this matter, further supporting the need to have Chicago Title's motion decided before depositions in this matter are conducted. Accordingly, Chicago Title respectfully requests that Your Honor deny Dare's request to adjourn the return date of Chicago Title's motion.

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Thank you for your consideration.

Respectfully submitted,

Michael R. O'Donnell

cc: All counsel of record via ECF

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